

ATTACHMENT A

To

Request for Immediate Discovery Conference

Richard Braun

From: Richard Braun <rbraun@braunlawassociates.com>
Sent: Tuesday, February 16, 2016 12:43 PM
To: Baugh, Mark (mbaugh@bakerdonelson.com)
Subject: block v meharry

Mark,

Hodge and Brady are now switched; Hodge will be on March 3 and Brady on March 4. Your response to plaintiff's fifth request for production is about due. How are you coming with the electronically stored information on former Dean Southerland's computer?

Sincerely,

Richard a/k/a harasser in chief

BRAUN & ASSOCIATES, PLLC

501 Union Street, Suite 500, Nashville, TN 37219

Office: (615) 259-1550

Toll Free: (888) 665-4902

Fax: (615) 259-2524

Email: rbraun@braunlawassociates.com

Web: www.braunlawassociates.com

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Richard Braun

From: Richard Braun <rbraun@braunlawassociates.com>
Sent: Friday, March 04, 2016 10:27 AM
To: 'Vincent, Nancy'
Cc: 'Parker, Casey'
Subject: RE: Re: block v. meharry

Thank you.

Sincerely,
Richard

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From: Vincent, Nancy [<mailto:nvincent@bakerdonelson.com>]

Sent: Friday, March 04, 2016 9:07 AM

To: Richard Braun

Cc: Parker, Casey

Subject: Re: block v. meharry

I will look into it this morning. Thx.

Sent from my iPhone

On Mar 4, 2016, at 9:05 AM, Richard Braun <rbraun@braunlawassociates.com> wrote:


Can you let me know the status of your responses to the fifth request for production which include reprimands and cvs. Our expert needs the cvs to prepare his opinion. Because of the delay we will need a couple extra weeks on the expert report deadline and we will likewise extend your expert deadline. Please let me know the status. The response is now more than two weeks overdue. Thank you.

Sincerely,
Richard

<image003.jpg>, PLLC

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Richard Braun

From: Richard Braun <rbraun@braunlawassociates.com>
Sent: Monday, March 07, 2016 12:56 PM
To: 'Vincent, Nancy'
Cc: 'Parker, Casey'
Subject: Re: block v. meharry

I will need it before the Southerland depo in time to review and use. Let's see if your trial settles on the courthouse steps.

Sincerely,
Richard

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From: Vincent, Nancy [mailto:nvincent@bakerdonelson.com]
Sent: Monday, March 07, 2016 12:41 PM
To: Richard Braun
Cc: Parker, Casey
Subject: ***SPAM*** Re: block v. meharry

Richard, apologies. All 3 of us start trial tomorrow. Can we get it to you promptly after trial? In about a week?

Sent from my iPhone

On Mar 7, 2016, at 12:38 PM, Richard Braun <rbraun@braunlawassociates.com> wrote:

Any word yet?

Sincerely,
Richard

<image002.jpg>, PLLC

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Sent: Friday, March 04, 2016 10:27 AM
To: 'Vincent, Nancy'
Cc: 'Parker, Casey'
Subject: RE: Re: block v. meharry

Thank you.

Sincerely,
Richard

<image003.jpg>, PLLC

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To: Richard Braun
Cc: Parker, Casey
Subject: Re: block v. meharry

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Sent from my iPhone

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Can you let me know the status of your responses to the fifth request for production which include reprimands and cvs. Our expert needs the cvs to prepare his opinion. Because of the delay we will need a couple extra weeks on the expert report

deadline and we will likewise extend your expert deadline. Please let me know the status. The response is now more than two weeks overdue. Thank you.

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Richard Braun

To: Parker, Casey (cparker@bakerdonelson.com)
Cc: Vincent, Nancy (nvincent@bakerdonelson.com)
Subject: Block v. Meharry

Counsel,

I am becoming concerned about the delay in discovery. Our expert needs the cv's of the full professors to review and prepare his report due on April 1. We received a disc with documents some of which were perplexing. The letter gave no indication of what the additional documents were responsive to. I have no idea the reason for the production of a music director at the Baptist Church or promotion and tenure documents for the University of North Carolina or a Paying for College Guide or a Health and Human Services Senate Bill.

But I do need the Southerland esi and the documents and esi responsive to the Fifth Request for Production. I need these in time to review prior to the Southerland deposition scheduled for next Monday March 14. Right now you have given me no idea when these materials will be provided to me. I will have no choice but to file for a discovery conference and alert Judge Bryant to this problem if we can't resolve it.

Please let me hear from you.

Sincerely,

Richard

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Richard Braun

From: Parker, Casey <cparker@bakerdonelson.com>
Sent: Tuesday, March 08, 2016 1:09 PM
To: Richard Braun
Subject: Automatic reply: Block v. Meharry

I will be in trial the rest of the week. Should you need immediate assistance, please contact my assistant, Deborah Wilson, at 615.726.5785 or dwilson@bakerdonelson.com. Thanks.

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